

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**JACQUELINE A. COTE, on behalf of herself
and others similarly situated,**

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

Civil Action No. 15-cv-12945-WGY

JOINT MOTION FOR STAY

In light of the parties' continued settlement discussions, the parties respectfully request that the Court stay all litigation and discovery deadlines for six weeks, until April 11, 2016.

On February 22, 2016, the parties attended a private mediation with experienced labor and employment law mediator Mark Irvings. The parties made significant progress at the mediation but require additional time to continue their discussions. To that end, the parties have scheduled a second mediation session on April 6, 2016.

A stay will allow the parties to preserve resources and focus their efforts on resolution of this matter. The parties will report back to the Court on or before April 11, 2016, and, if a revised pre-trial schedule is needed, will submit a proposed revised schedule that will postpone the existing deadlines in the schedule by six weeks without requiring the Court to postpone the November 2016 trial date, and without prejudicing any party's ability to meet those deadlines.

WHEREFORE, the parties respectfully move the Court to stay all litigation and discovery deadlines for six weeks, to and including April 11, 2016.

Dated: March 2, 2016

JACQUELINE COTE

/ s / Peter Romer-Friedman

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Respectfully submitted,

WAL-MART STORES, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd of March, 2016, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s / Terence P. McCourt